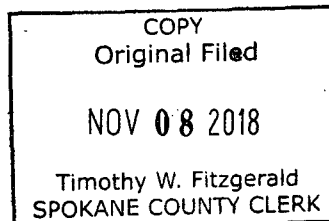


EXHIBIT A



IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR SPOKANE COUNTY

HALEY KARNITZ, an individual

Plaintiff,

v.

AMERICAN MEDICAL RESPONSE
AMBULANCE SERVICE, INC., a Delaware
corporation,

Defendant.

18205015-32

CASE NO.

COMPLAINT FOR DAMAGES

I. PARTIES, JURISDICTION AND VENUE

1.1 Plaintiff, Haley Karnitz, is an individual residing in Spokane County, Washington, and an "employee" within the meaning of RCW 49.12.175, RCW 49.58.010(4), and RCW 49.60.180(10).

1.2 Defendant American Medical Response Ambulance Service, Inc. (“AMR”) is a Delaware Corporation doing business in Spokane County, Washington, and an “employer” within the meaning of RCW 49.12.175, RCW 49.58.010(5), and RCW 49.60.180(11).

1.3 This Court has original jurisdiction in this matter pursuant to RCW 2.08.010.

1.4 Venue is proper in Spokane County pursuant to RCW 4.12.020 and/or RCW 4.12.025.

II. FACTUAL ALLEGATIONS

2.1 Haley Karnitz is, and at all times relevant to the complaint, was an employee of AMR.

2.2 Ms. Karnitz was hired by AMR in February of 2009.

2.3 Ms. Karnitz was promoted to Paramedic in 2010.

2.4 Ms. Karnitz was promoted to Associate Supervisor in April of 2015.

2.5 Ms. Karnitz was promoted to Field Supervisor in October of 2015.

2.6 Ms. Karnitz was pregnant in early 2016.

2.7 During the course of Ms. Karnitz’s pregnancy in 2016, AMR Operations Manager Patrick Ramsey directed Ms. Karnitz to climb into a dumpster, and fish out uniforms that someone had dumped into the dumpster.

2.8 Mr. Ramsey observed Ms. Karnitz as she performed this task and then—after they returned to his office—Mr. Ramsey sat behind his desk with his arms folded behind his head and directed Ms. Karnitz to “go pick that shit up off my floor.” Mr. Ramsey was referring to boxes and other garbage on his floor.

2.9 Ms. Karnitz completed the task as directed and returned to Mr. Ramsey’s office to find his door shut.

1 2.10 Mr. Ramsey persisted in his discriminatory and bullying treatment of Ms. Karnitz,
2 throughout the summer of 2016.

3 2.11 In this time frame, Ms. Karnitz approached Regional Director Paul Priest and
4 complained about Mr. Ramsey's mistreatment of her.

5 2.12 Mr. Priest responded that Mr. Ramsey would not be with AMR for long and that
6 Ms. Karnitz was the future of AMR.

7 2.13 Ms. Karnitz went on maternity leave in October of 2016.

8 2.14 Ms. Karnitz returned from maternity leave in January of 2017.

9 2.15 In this time frame, Ms. Karnitz was promoted to the position of Chief Operations
10 Supervisor.

11 2.16 In connection with this promotion, Ms. Karnitz received no increase in pay.

12 2.17 Male supervisors who had been promoted to the position of Chief Operations
13 Supervisor received an increase in pay.

14 2.18 In the Spring of 2017, Ms. Karnitz approached Mr. Priest about a pay increase
15 because of the increase in responsibilities. As she had a newborn at home, she wanted to know
16 whether she was valued by the Company.

17 2.19 Mr. Priest informed her that pay increases were coming and that he needed to assign
18 her to work at the Yakima facility and to fix the operation there.

19 2.20 Mr. Priest also indicated that Ms. Karnitz should plan to travel to a conference in
20 Las Vegas and return with relevant material to improve the Spokane operation.

21 2.21 In this timeframe, Ms. Karnitz was breastfeeding her newborn child and Mr. Priest
22 left it to Ms. Karnitz to decide when she wanted to begin the increased managerial responsibilities.
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1 2.22 In April of 2017, Mr. Ramsey continued his campaign to undermine Ms. Karnitz.
2 After Ms. Karnitz complained about this issue to Mr. Priest, Mr. Priest asked Ms. Karnitz for a
3 chance to fix it and directed Ms. Karnitz to call out sick. After she followed Mr. Priest's
4 instructions, Mr. Ramsey reacted with aggressive criticism.

5 2.23 In late April, Ms. Karnitz met with Mr. Ramsey and Mr. Priest and Mr. Priest
6 indicated that Ms. Karnitz was on a fast track for promotion.

7 2.24 In early May, Ms. Karnitz began experiencing post-partum depression.

8 2.25 Ms. Karnitz approached Mr. Priest and Mr. Ramsey in early May for feedback on
9 her progress, and they reassured her that she was doing fine.

10 2.26 Later that day, Ms. Karnitz reported to Mr. Priest and Mr. Ramsey that she was
11 experiencing post-partum depression, that it was affecting her home and work life, and they she
12 needed an accommodation to manage her temporary disability.

13 2.27 Suddenly, the entire orientation shifted. Mr. Priest and Mr. Ramsey told her that
14 the Company would not accommodate her, and that she was not meeting expectations.

15 2.28 Ms. Karnitz immediately sought and received professional medical help for her
16 temporary disability.

17 2.29 Meanwhile, Mr. Priest and Mr. Ramsey pressured Ms. Karnitz to decide whether
18 she wanted to continue in her leadership position with AMR.

19 2.30 During this time frame, Ms. Karnitz received a positive annual performance review,
20 meeting or exceeding expectations in nearly all categories, with only one minor criticism.

21 2.31 In June of 2017, Mr. Ramsey removed Ms. Karnitz from the Chief Operations
22 Supervisor position.

1 2.32 Instead of demoting Ms. Karnitz back to the Field Supervisor position—as had been
2 the case with males who failed to succeed as Chief Operations Supervisor—Mr. Ramsey demoted
3 Ms. Karnitz all the way back to the Paramedic position.

4 2.33 Other employees in the Chief Operations Supervisor position, including without
5 limitation, Ed Palmer, were provided additional assistance, and when demoted, were not demoted
6 as adversely as Ms. Karnitz was demoted.

7 2.34 After demoting Ms. Karnitz, Mr. Ramsey began a campaign to disparage,
8 undermine and discriminate against Ms. Karnitz because of her efforts to resist his discriminatory
9 behavior towards her.

10 2.35 Despite repeated requests, the Company has failed to constrain Mr. Ramsey in his
11 campaign to undermine Ms. Karnitz's career at AMR.

12 2.36 Specifically, Mr. Ramsey has directed others to show no flexibility to Ms. Karnitz
13 in situations where supervisors routinely show flexibility towards similarly situated employees. In
14 addition, Mr. Ramsey recently directed a supervisor to require to tell Ms. Karnitz to go home or
15 run calls instead of performing inventory, treating her differently than another employee who was
16 paid overtime and given a day off to perform inventory.

17 2.37 In addition, the Company has refused to confirm or share a positive letter of
18 commendation from a local fire chief relating to Ms. Karnitz work performance while regularly
19 posting kudos letters for other crew members.

20 2.38 As a result of Defendant's discriminatory employment practices, pay practices
21 and/or working conditions, and as a result of the Defendant's discriminatory and/or retaliatory
22 work environment, Plaintiff has suffered substantial economic losses and loss of opportunity in an
23 amount to be proven at trial.

2.39 As a result of Defendant's discriminatory hiring practices, pay practices, and/or working conditions, and as a result of the Defendant's discriminatory and/or retaliatory work environment, Plaintiff has suffered general damages including pain and suffering and emotional distress, in an amount to be proven at trial.

III. FIRST CAUSE OF ACTION
Sex Discrimination
Washington Law Against Discrimination
RCW 49.60.180

3.1 Plaintiff realleges paragraphs 1.1 through 2.39 as though fully set forth herein.

3.2 Defendant's actions and/or omissions constitute a violation of RCW 49.60.180 insofar as Defendant has demoted Ms. Karnitz from Chief Operations Supervisor to Paramedic because of her sex.

3.3 As a result of Defendant's repeated and ongoing violations of the law, Plaintiff has been damaged in an amount to be proven at trial.

IV. SECOND CAUSE OF ACTION
Disability Discrimination and/or Failure to Reasonably Accommodate
Washington Law Against Discrimination
RCW 49.60.180

4.1 Plaintiff realleges paragraphs 1.1 through 3.3 as though fully set forth herein.

4.2 Defendant failed and/or refused to accommodate Ms. Karnitz's pregnancy and/or post-partum disability and/or discriminated against Ms. Karnitz because of her pregnancy or post-partum disability.

1 4.3 As a result of Defendant's repeated and ongoing violations of the law, Plaintiff has
2 been damaged in an amount to be proven at trial.

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4 **V. THIRD CAUSE OF ACTION**
5 **Sex-Based Pay Discrimination**
6 **RCW 49.12.175 and/or RCW 49.58.020 and RCW 49.58.030**

7 5.1 Plaintiff realleges paragraphs 1.1 through 4.3 as though fully set forth herein.

8 5.2 Defendant has engaged in pay discrimination on the basis of sex and/or has
9 undermined Plaintiff's career progression and pay based on sex in violation of RCW 49.12.175
10 and/or RCW 49.58.020 and RCW 49.58.030.

11 5.3 As a result of Defendant's repeated and ongoing violations of the law, Plaintiff has
12 been damaged in an amount to be proven at trial.

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15 **VI. FOURTH CAUSE OF ACTION**
16 **Retaliation**
17 **RCW 49.60.210 and/or RCW 49.58.050**

18 6.1 Plaintiff realleges paragraphs 1.1 through 5.3 as though fully set forth herein.

19 6.2 Defendant's actions and/or omissions constitute violations of RCW 49.60.210
20 and/or RCW 49.58.050.

21 6.3 As a result of Defendant's violations, Plaintiff has been damaged in an amount to
22 be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter an order granting the following relief:

1. An order finding that Defendant discriminated against Plaintiff because of her sex and/or because she raised and/or complained about discrimination with respect to promotional opportunities, hiring opportunities, pay, and/or other terms and conditions of employment in violation of RCW 49.60.180, RCW 49.60.210, RCW 49.12.175 and/or RCW 49.58;

2. An order finding that Defendant discriminated against Plaintiff because of her disability and/or failed to reasonably accommodate her disability as required by RCW 49.60.180;

3. An order granting Plaintiff full back pay and benefits and other actual monetary losses in an amount to be proven at trial as a result of the discriminatory and/or retaliatory actions and/or omissions;

4. An order granting Plaintiff front pay and benefits designed to adequately compensate Plaintiff for loss of future wages and other economic losses in an amount to be proven at trial;

5. An order granting Plaintiff an award of damages for all other forms of economic losses and non-economic losses, including without limitation specific damages and general damages for mental anguish, emotional distress, and pain and suffering in an amount to be proven at trial;

6. Statutory damages under RCW 49.12.175 and/or RCW 49.58.070;

1 7. An order granting Plaintiff her attorney's fees pursuant RCW 49.60.030(2), RCW
2 49.12.175, RCW 49.48.030, RCW 49.52.050 and/or RCW 49.58.070, along with costs incurred in
3 prosecuting this action in an amount to be proven at trial;

4 8. Pre-judgment and post-judgment interest; and

5 9. Such other and further relief as the Court deems just and equitable.
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8 RESPECTFULLY SUBMITTED this 3rd day of November, 2018.
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10 VANGUARD LAW, LLC
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12 By: 
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